

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

**IN RE: VALSARTAN,
LOSARTAN, AND
IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

*This Document Relates to All Losartan
and Irbesartan Actions*

**Case No. 19-md-2875
MDL No. 2875**

**Honorable Renée Marie Bumb,
Chief District Judge**

**Special Master Judge Thomas
Vanaskie**

[PROPOSED] ORDER

THIS MATTER having come before the Court upon Wholesaler Defendants' Motion to Strike Plaintiffs' Objections to Wholesaler Defendants' Deposition Examination of Fact Witness Michelle Keller, and the Court having reviewed the papers submitted by Wholesaler Defendants in support of their motion and the papers submitted by Plaintiffs in opposition, if any, and the Court having heard oral argument, if any, and the Court having considered the matter and good cause having been shown, IT IS HEREBY **ORDERED** that Wholesaler Defendants' Motion to Strike Plaintiffs' Objections to Wholesaler Defendants' Deposition Examination of Fact Witness Michelle Keller is **GRANTED**. Plaintiffs' objections to Wholesaler Defendants' Examination of Ms. Keller are struck, including Plaintiffs' objection to any Wholesaler Defendants' asking any questions at any fact deposition noticed by Plaintiffs, unless that Defendant serves a cross-notice.

This ____ day of _____, 2024.

Honorable Renée Marie Bumb
Chief District Judge